# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALEXANDER FLEISS, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

OPTIONABLE INC.

Defendants.

JAGDISH PATEL, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

OPTIONABLE INC., KEVIN CASSIDY, and EDWARD J. O'CONNOR

Defendants.

EDWARD PETERS, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

OPTIONABLE INC., MARK NORDLICHT, KEVIN P. CASSIDY, EDWARD J. O'CONNOR, ALBERT HELMIG, and MARC-ANDRE BOISSEAU.

Defendants.

Civil Action No.: 1:07-CV-03753 (LAK)

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Civil Action No.: 07-CV-03845 (LAK)

Civil Action No.: 07-CV-3877 (LAK)

JONATHAN Glaubach, Individually and on Behalf of All Others Similarly Situated,

Plaintiff.

v.

OPTIONABLE INC., KEVIN CASSIDY, MARK NORDLICHT, EDWARD J. O'CONNOR, ALBERT HELMIG, and MARC-ANDRE BOISSEAU.

Defendants.

STANLEY T. BOCK III, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

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OPTIONABLE INC., KEVIN CASSIDY, MARK NORDLICHT, EDWARD J. O'CONNOR, ALBERT HELMIG, and MARC-ANDRE BOISSEAU.

Defendants.

Civil Action No.: 07-CV-4085 (LAK)

Civil Action No.: 07-CV-5948 (LAK)

# MOTION OF MARC A. HEMBROUGH FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF CHOICE OF LEAD COUNSEL

COMES NOW Marc A. Hembrough, by and through his counsel, and hereby moves this Court for:1) consolidation of all related securities fraud cases against Optionable Inc. and the other defendants; 2) appointment of Marc A. Hembrough as Lead Plaintiff; and 3) appointment of the firm of Spector Roseman & Kodroff as Lead Counsel.

In support of this Motion Hembrough submits the accompanying Memorandum and the Declaration of Robert Roseman.

Dated: July 10, 2007

Respectfully submitted,

SPECTOR, ROSEMAN & KODROFF, P.C.

Robert M. Roseman

John A. Macoretta

SPECTOR, ROSEMAN & KODROFF, P.C.

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Attorneys for Marc A. Hembrough Proposed Lead Counsel for the Class

### **CERTIFICATE OF SERVICE**

I, John A. Macoretta, hereby certify that I caused today the following to be electronically filed with the Clerk of Court by using the ECF System: Motion of Marc Hembrough for Consolidation, Appointment as Lead Plaintiff, and Approval of Choice of Lead Counsel; Memorandum of Law in Support of Motion of Marc Hembrough for Consolidation, Appointment as Lead Plaintiff, and Approval of Choice of Lead Counsel and Declaration of Robert M. Roseman with Exhibits A-C. I also caused said documents to be served via regular mail on the following:

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Dated: July 10, 2007

John A. Macoretta